

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WOONASQUATUCKET RIVER
WATERSHED COUNCIL, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF
AGRICULTURE, *et al.*,

Defendants.

Case No. 1:25-cv-00097-MSM-PAS

NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiffs file this notice to inform the Court of the recent relevant decision denying the defendants' motion for reconsideration in *New York v. Trump*, No. 25-cv-39, Dkt. No. 182 (D.R.I. Apr. 14, 2025), attached here.

In *New York*, the federal district court had previously granted the plaintiff states' motion for enforcement of its preliminary injunction after finding that one of the defendants, the Federal Emergency Management Agency, was implementing a manual review process that violated the preliminary injunction. Dkt. No. 182, at 4. The defendants sought reconsideration, arguing that the district court lacked jurisdiction under the Supreme Court's recent stay opinion in *Department of Education v. California*. *See id.* The district court rejected that argument, explaining that, unlike in *California*, "the terms and conditions of each individual grant that the States receive from the Agency Defendants *are not at issue*. Rather, this case deals with the Agency Defendants' implementation of a broad, categorical freeze on

obligated funds *pending* determinations on whether it is lawful to end disbursements of such funds.” *Id.* at 6 (emphasis in original). “Therefore,” the court concluded, its “orders addressing the categorical funding freeze were *not* enforcing a contractual obligation to pay money.” *Id.* at 6–7 (emphasis in original); *see also id.* at 7 n.2.

Dated: April 14, 2025

Respectfully submitted,

/s/ Miriam Weizenbaum

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CERTIFICATE OF SERVICE

On April 14, 2025, I caused the foregoing and accompanying materials to be served on all Defendants through the CM/ECF system.

/s/ Miriam Weizenbaum
Miriam Weizenbaum